

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

CARL G. SIMPSON, *et al.*,

:

Case No. 1:00cv00014-SJD

(Judge Susan J. Dlott)

Plaintiffs,

:

v.

:

AGREED PROTECTIVE ORDER

:

INTERMET CORPORATION, *et al.*

:

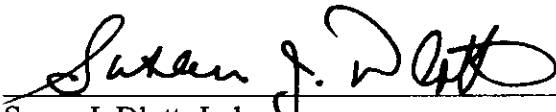
Defendants.

:

The parties recognize that depositions and exhibits to depositions may describe: (a) the operation of a foundry machine, containing Defendants' confidential, proprietary and trade secret information; (b) confidential government investigations and reports; and (c) Decedent's, Plaintiffs', and witnesses' personal information. Accordingly, the parties agree that they may attach relevant portions of the depositions and exhibits to summary judgment pleadings, but that any complete depositions and exhibits that they intend to file will be filed under seal.

The parties have agreed to, and the Court hereby Orders that relevant portions of depositions and exhibits may be attached to summary judgment pleadings and filed with this Court, but the complete depositions and exhibits shall be filed under seal.

Entered this ____ day of _____, 2004.


Susan J. Dlott, Judge

Agreed to :

s/Nancy J. Bride

Mark T. Hayden (#0066162)

Nancy J. Bride (#0068559)

GREENEBAUM DOLL & MCDONALD PLLC

2800 Chemed Center

255 East Fifth Street

Cincinnati, Ohio 45202

Attorneys for Defendant Hayes Lemmerz
International-Equipment & Engineering, Inc.,
d/b/a CMI - Equipment and Engineering, Inc.

s/Patricia Anderson Pryor (per telephone authorization)

Lawrence J. Barty

Patricia Anderson Pryor

Taft, Stettinius and Hollister LLP

425 Walnut street, Suite 1800

Cincinnati, Ohio 45202

Trial Attorneys for Internet Corporation
and Ironton Iron, Inc.

s/D. Scott Bowling (per telephone authorization)

D. Scott Bowling

P.O. Box 725

215 South Fourth Street

Ironton, Ohio 45638

Attorney for Plaintiffs

CIN:598723.1